

1 Michele R. Stafford, Esq. (SBN 172509)
Adrian L. Canzoneri, Esq. (SBN 265168)
2 SALTZMAN & JOHNSON LAW CORPORATION
44 Montgomery Street, Suite 2110
3 San Francisco, CA 94104
(415) 882-7900
4 (415) 882-9287 – Facsimile
mstafford@sjlawcorp.com
5 acanzoneri@sjlawcorp.com

6 Attorneys for Plaintiffs

7 Jeffrey S. Kaufman, Esq. (SBN 122569)
Susan E. Bishop, Esq. (SBN 187253)
8 BERLINER COHEN
Ten Almaden Blvd., 11th Floor
9 San Jose, CA 95113
(408) 286-5800
10 (408) 998-5388 – Facsimile
jsk@berliner.com
11 susan.bishop@berliner.com

12 Attorneys for Defendants

13 UNITED STATES DISTRICT COURT
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA

15 RUSSELL E. BURNS, et al.,

16 Plaintiffs,

17 v.

18 G.R. CLARK, INC., a California corporation;
19 GORDON RAYMOND CLARK, an
Individual; and DENNIS GORDON CLARK,
20 an Individual,

21 Defendants.

Case No.: 3:15-cv-00385-VC

**JOINT STIPULATION TO CONTINUE
INITIAL CASE MANAGEMENT
CONFERENCE; ~~[PROPOSED]~~ ORDER
THEREON**

Date: April 28, 2015
Time: 2:30 p.m.
Dept.: Courtroom 4, 17th Floor
450 Golden Gate Ave.
San Francisco, CA
Judge: Honorable Vince Chhabria

23 Plaintiffs and Defendants, by and through their respective counsel of record, hereby
24 respectfully request that the Initial Case Management Conference, currently scheduled for April
25 28, 2015, be continued for approximately forty-five (45) days, or as soon thereafter as may be
26 convenient for the Court. GOOD CAUSE exists for the requested continuance as follows:

27 1. As the Court's records will reflect, this action was filed by Plaintiffs on January 27,
28 2015 [Dkt. No. 1] to compel Defendants' compliance with its obligations to pay monthly

1 employee contributions to Plaintiffs, along with payment of amounts found due in an audit
2 inspection of Defendants' payroll records, pursuant to Defendants' Collective Bargaining
3 Agreement.

4 2. Defendants filed an Answer to the Complaint on February 25, 2015 [Dkt. No. 14].

5 3. Counsel for both Plaintiffs and Defendants are currently engaged in preliminary
6 discussions towards potential resolution of this matter.

7 4. The parties have an ADR Phone Conference with the Court's Alternative Dispute
8 Resolution Program scheduled for April 22, 2015 [Dkt. No. 17].

9 5. The parties jointly request a continuance of the Case Management Conference so as
10 to allow the parties to further facilitate settlement of this matter, as both parties desire to resolve
11 this matter without the need for further litigation.

12 6. This is the first such request made by either party to this matter.

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7. There are no issues that need to be addressed by the parties at the currently scheduled Initial Case Management Conference. In the interest of conserving costs, as well as the Court's time and resources, Plaintiffs and Defendants jointly and respectfully request that the Initial Case Management Conference, currently scheduled for April 28, 2015, be continued for approximately forty-five (45) days, to allow sufficient time for the parties to continue their attempts to resolve this matter outside of litigation.

SO STIPULATED.

Dated: April 21, 2015

SALTZMAN & JOHNSON
LAW CORPORATION

By: /S/
Adrian L. Canzoneri
Attorney for Plaintiffs

Dated: April 21, 2015

BERLINER COHEN

By: /S/
Susan E. Bishop,
Attorney for Defendants

IT IS SO ORDERED.

Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Initial Case Management Conference is hereby continued to June 16, 2015, at 10:00 a.m.. All related deadlines are extended accordingly.

Date: April 23, 2015


UNITED STATES DISTRICT JUDGE